

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Floyd Little, et al. v. National Football
League, et al.

Court File No. 2:12-cv-2219-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFF
TIMOTHY L. SMITH**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiffs' Counsel"), moves this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Timothy L. Smith only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Floyd Little, et al. v. National Football League, et al.*, No. 2:12-cv-2219-AB, in the Eastern District of Pennsylvania on April 24, 2012, for the benefit of several retired National Football League players, including Timothy L. Smith.

2. Plaintiffs' counsel filed a short form complaint for Plaintiffs Timothy L. Smith on July 16, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiff Timothy L. Smith and the undersigned.

4. Plaintiffs' counsel properly notified Timothy L. Smith of counsel's intention to withdraw from representing him in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Timothy L. Smith only in Court File No. 2:12-cv-2219-AB.

Dated: February 9, 2017

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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J. Gordon Rudd, Jr. (#222082)

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